
SMITH & WESSEL ASSOCIATES, INC.

HAZARDOUS BUILDING MATERIALS AND AIR QUALITY SPECIALISTS

February 28, 2012

United States Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Attn: Kimberly N. Tisa, PCB Coordinator

Ref: Leominster High School, Leominster, MA, PCBs Remediation Plan

Dear Ms. Tisa:

In response to your letter dated February 21, 2012, on behalf of the Leominster Public Schools, Smith & Wessel Associates (SWA) submits this letter addressing the questions and comments you had pertaining to the revised Work Plan for Removal of PCBs at Leominster High School in Leominster, Massachusetts, dated February . Based EPA's comments, we've modified and updated the plan – see attached plan dated February 26, 2012.

Our responses are addressed as follows:

Comments on February 10, 2012 Plan

1. We've received the additional samples of caulk from the 1990 CTE wing. Results indicated PCB result samples were less than one ppm (see attached and our comments on page 5 of the plan explain the newly collected results).
2. Elevated concentrations were only noted within caulk seams themselves. Additional layers of encapsulant will be applied until acceptable results are obtained.
3. We have modified the plan to include a linear foot component to the wipe sampling plan under Section 7.3 of the plan. We do not know the precise linear foot of metal that may require sampling, as items such as door frames that are not being saved, may be disposed as remediation waste or cleaned and then sampled before salvage. Sampling requirements for glazed tile have been included.
4. Based on average concentrations of PCBs in soils below 1 ppm, sampling of soils every 100 linear feet after removal would seem to be appropriate for verification purposes after removal of the top soil layer.

Should you have any questions or if I can be of any further assistance, please do not hesitate to contact me.

Respectfully submitted,
SMITH & WESSEL ASSOCIATES, INC.

A handwritten signature in cursive script, reading "William C. Wessel".

William C. Wessel
Principal

